



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

(C-14J)

February 15, 2007

VIA Electronic Mail and Certified Mail

David W. Hacker
United States Steel Corporation
Law Department
600 Grant Street
Pittsburgh, PA 15219

Mr. Hacker:

On October 26, 2007, United States Environmental Protection Agency (EPA) sent United States Steel (U.S. Steel) a request for information under the authority of Section 114 of the Clean Air Act (information request). You replied to EPA on or around December 7, 2007, and January 7, 2008, with information responding to our request. We found one of your responses deficient and ask that U.S. Steel submit a correct and full response to the original request according to the time period explained below.

Paragraph 13 of the information request asks U.S. Steel to take opacity readings at the #4, #6, and #8 blast furnace partial enclosures. Excerpts from the request are below:

1. Emissions Testing: U.S. Steel must conduct tests to determine the opacity of particulate matter being emitted to the environment according to the schedule below. Specifically, U.S. Steel must perform the following tests pursuant to 40 C.F.R Part 60, Appendix A, EPA Method 9 for:
 - The #4 partial enclosure around the iron spout and bottle car/torpedo car for two consecutive taps, twice per week (four heats per week) for two consecutive weeks.
 - The #6 partial enclosure around the iron spout and bottle car/torpedo car for two consecutive taps, twice per week (four heats per week) for two consecutive weeks.
 - The #8 partial enclosure around the iron spout and bottle car/torpedo car for two consecutive taps, twice per week (four heats per week) for two consecutive weeks.


- a. U.S. Steel must begin taking these readings within 2 weeks of receipt of this request.
- b. The results of these readings and any related information shall be submitted within 60 days of receipt of this request.
- c. For the readings taken at the No. 4, 6, and 8 partial enclosures around the iron spouts and No. 2 Q-BOP Shop slag skimming area, the readings must be taken just on the outside of the partial enclosures where particulate, if any, escapes to the atmosphere. Readings shall not be taken at the roof monitor of the respective shops.

In short, the request asks that U.S. Steel take readings just at the outside of the enclosure around the iron spouts and specifically states that the reading should **not** be taken at the roof monitor. In reviewing U.S. Steel's response, we believe the opacity reader was reading the roof monitor. Many of the sheets provide the Source as, "4BF Roof Monitor," or, "#4 Furnace top/relief valves," and all sheets state the height of the source as 63' for #4 (59' for #8). The openings at the partial enclosure are approximately 20' or less above grade. Furthermore, the information request to did not instruct U.S. Steel to take a reading at the top of the blast furnaces.

Within 30 days from receipt of this letter, please respond with the opacity readings as outlined in the information request - four heats per week for two weeks for all operating furnaces. To the extent you can provide evidence that the reader was in fact reading exit points or the boundary of the enclosures and not the roof monitor, those readings will be sufficient, as long as U.S. Steel clearly identifies for EPA the dates, times, etc. that these compliant readings were done.

Feel free to contact me at (312) 353-5485 or, if you have technical question, Brian Dickens at (312) 886-6073 regarding this letter.

Sincerely,



Sabrina Argentieri
Associate Regional Counsel

cc: Brian Dickens
Environmental Engineer
Air Enforcement Compliance Branch
EPA, Region 5